

# **EXHIBIT B**

**Re: Document Production****Caitlyn Silhan** to: Mackin, Anna

Cc: "Clopton, Jodie", "Martinez, Tamera"

Bcc: Vivian Cox-Kahey

01/12/2017 02:28 PM

Likewise, Anna. With respect to point 1, I'm confirming that electronic production via secure share is acceptable at this point. If that changes, I will let you know. As to point 2, I'm also confirming that we have agreed to extend tomorrow's deadline for the remaining 10,000 pages to Tuesday at noon. Let me look into point 3 and get back to you.

Best regards,

Caitlyn

**waterskraus**

**Caitlyn Silhan | Attorney**

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**Please note new address**

"Mackin, Anna"

Caitlyn, I write to confirms our conversation a few...

01/12/2017 01:26:28 PM

From: "Mackin, Anna" <Anna.Mackin@oag.texas.gov>  
 To: Caitlyn Silhan <csilhan@waterskraus.com>,  
 Cc: "Clopton, Jodie" <Jodie.Clopton@oag.texas.gov>, "Martinez, Tamera" <Tamera.Martinez@oag.texas.gov>  
 Date: 01/12/2017 01:26 PM  
 Subject: Document Production

Caitlyn,

I write to confirms our conversation a few moments ago. We agreed to the following regarding document production in Stringer v. Cascos:

1. Defendants will produce the first batch of documents to you, Vivian your paralegal, and the TCRP attorneys tomorrow. This currently numbers about 2,000 pages in Relativity. When the files are ready, Tamera will share a link to access them via secure share.
2. I will complete review of a second batch of documents before Tuesday morning (Monday is a State holiday). I have not seen this batch yet because it is still being processed by EDS, but my best estimate (subject to change) is that it is about 10,000 pages. First thing Tuesday morning I will ask EDS to process the files ASAP with the aim of providing them to you by Tuesday at noon. If EDS anticipates that the processing time will be longer than this, I will inform you immediately and give you their best estimate of the files will be ready for production. At that point, Tamera will provide them to you, Vivian, and the TCRP attorneys via secure share.
3. We discussed producing Excel files both natively and "Watermarked" (bearing a "CONFIDENTIAL" stamp), with the agreement that only the watermarked versions would be used. I just spoke with our EDS consultant, however, and he reminded me that, under the ESI

agreement, we will be providing a load file with the metadata for each native file produced. Given this, would it be acceptable for us to produce watermarked files only? I'm proposing this because it might be more straightforward when it comes to bates numbering, etc.

Please let me know your thoughts on point 3, and also correct me if you had a different understanding of our agreement regarding points 1 and 2.

Thanks, as always, for your professionalism.

Sincerely,  
Anna

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